

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PATRICIA CLEMENSON,

Plaintiff,

v.

Case No. 3:18-cv-01318-M

GC SERVICES LIMITED
PARTNERSHIP,

Defendant.

MOTION TO WITHDRAW AS ATTORNEYS

NOW COME Joseph S. Davidson and Mohammed O. Badwan of Sulaiman Law Group, Ltd. and Jason M. Katz of Hiersche Hayward Drakeley & Urbach P.C. (collectively “Plaintiff’s attorneys”), pursuant to N.D. Ill. L.R. 83.17, moving this Court for leave to withdraw as attorneys for PATRICIA CLEMENSON (“Plaintiff”). In support thereof, Plaintiff’s attorneys assert as follows:

BACKGROUND

1. On May 23, 2018, Plaintiff brought suit against GC SERVICES LIMITED PARTNERSHIP alleging violations of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.*; Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227 *et seq.* and the Texas Debt Collection Act (“TDCPA”), Tex. Fin. Code Ann. § 392 *et seq.* [Doc. #1].

RELIEF REQUESTED

2. Plaintiff’s attorneys respectfully request that this Honorable Court enter an Order Granting Joseph S. Davidson and Mohammed O. Badwan of Sulaiman Law Group, Ltd. and Jason

M. Katz of Hiersche Hayward Drakeley & Urbach P.C. leave to withdraw as attorneys of record for Plaintiff.

BRIEF IN SUPPORT

3. The parties are currently engaged in discovery. Defendant is requesting to take Plaintiff's deposition and has requested availability from Plaintiff's attorneys.

4. Despite Plaintiff's attorneys' numerous attempts to communicate with Plaintiff – *by telephone as well as in writing* – Plaintiff is unresponsive.

5. Plaintiff's attorneys cannot adequately represent Plaintiff without Plaintiff's cooperation.

6. No attorney is to be substituted at this time. Plaintiff's most recent address/contact information is:

Patricia Clemenson
11904 Carlin Drive
Fort Worth, Texas 76108
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blipper33@aol.com

7. Plaintiff's attorneys have attempted to obtain Plaintiff's consent to this Motion; however, have been unsuccessful.

WHEREFORE, Plaintiff's attorneys respectfully request that this Honorable Court enter an Order Granting Joseph S. Davidson and Mohammed O. Badwan of Sulaiman Law Group, Ltd. and Jason M. Katz of Hiersche Hayward Drakeley & Urbach P.C. leave to withdraw as attorneys of record for Plaintiff; and grant such other relief as this Court deems just and proper.

Dated this 9th day of January, 2019

Respectfully submitted,

/s/ Joseph S. Davidson

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Counsel for Patricia Clemenson

CERTIFICATE OF CONFERENCE

I hereby certify that on January 9, 2019, I conferred with Charles Crawford, attorney for GC Services Limited Partnership, regarding the relief sought herein. Counsel for GC Services Limited Partnership is unopposed to filing this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2019, I electronically filed the foregoing with the Clerk of the Court for the Northern District of Texas by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by Certified Mail® postage prepaid to the following non-CM/ECF participants:

Patricia Clemenson
11904 Carlin Drive
Fort Worth, Texas 76108

/s/ Joseph S. Davidson